

ASSOCIATION OF ZOOS & AQUARIUMS

8403 Colesville Road, Suite 710
Silver Spring, MD 20910-3314
301-562-0777 tel 301-562-0888 fax
www.aza.org

March 6, 2009

The Honorable Richard Roy
The Honorable Edward Meyer
Co-Chairmen
Joint Committee on the Environment
Connecticut General Assembly
Room 3200, Legislative Office Building
Hartford, CT 06106

RE: House Bill No. 6555

Dear Chairmen:

On behalf of the 216 accredited members of the Association of Zoos and Aquariums (AZA), I would like to address specific issues regarding House Bill 6555, an act concerning the humane treatment of elephants.

AZA is a non-profit accrediting organization for zoos and aquariums, including two in the State of Connecticut. AZA Accreditation Standards are comprehensive, including all aspects of an institution's operation, including the animal collection, veterinary care, physical facilities, safety, security, finance, staff, governing authority, support organization, education programs, conservation and research and adherence to the organizations' policies and standards. (A copy of the AZA Accreditation Standards is included with this letter.)

AZA accredited zoos and aquariums draw over 175 million visitors annually including 50 million children. These institutions provide living classrooms for science education. A 2009 National Research Council report found "abundant evidence that these programs and settings, contribute to people's knowledge and interest in science" and that they can "significantly improve outcomes for individuals from groups that are historically underrepresented in science."

As regards elephant care, the standards set by the AZA with input from its Elephant Taxon Advisory Group/ Species Survival Plan (TAG/SSP) are the result of years of refinement and are based on the collective experience of managing elephants in over 80 zoos. Input from researchers and experts, combined with years of hands-on institutional experience, have been used to continually raise the bar in elephant care for all accredited zoos.

The AZA Elephant TAG/SSP is guided by a Steering Committee which is comprised of fifteen individuals who are elected from and by the institutional representatives of the 80 AZA accredited institutions holding elephants in North America. This body oversees the population management of over 280 African and Asian elephants currently housed in these institutions. These elephants represent over half the total elephant population in North America. This steering committee has, cumulatively, over 300 years of elephant management experience. Active since 1985, the TAG/SSP Steering Committee has worked continually to address elephant welfare issues and bring forward knowledge and expertise to aid in the management of elephants under human care.

The Elephant TAG/SSP has an extensive list of scientific advisors for nutrition, veterinary

medicine, pathology, behavior, education, population management, reproduction, conservation, and research. These advisors are leaders in their field of expertise and contribute significantly in the overall advancement of health and welfare in our elephant population. The Elephant TAG/SSP veterinary advisors have developed protocols for overall medical assessment, pre-transport screening, quarantine, transport, and necropsy and distributed them to all elephant holding institutions.

Clearly, AZA elephant holding facilities, through the leadership of the Elephant TAG/SSP Steering Committee, have led the way in improving the welfare and conditions for the elephants in their care. These professionals are best suited to develop and maintain standards for elephant care and have demonstrated over and over their commitment to do so.

Additionally, numerous AZA elephant holding facilities and AZA elephant experts have hosted and participated in training courses and seminars for USDA/APHIS inspectors to help expand their knowledge base to better carry out their mission under the AWA.

AZA shares a common vision with other professional elephant conservation organizations and with our elephant care colleagues – a vision that includes elephants in the world's future forever, both in zoos and in the wild. The future for elephants looks promising, and it will remain promising as long as it is left in the hands of the committed professional conservation organizations and knowledgeable professional elephant care experts who have dedicated their lives to ensuring that there will be elephants for future generations.

AZA COMMENTS

House Bill No. 6555 suggests that the prohibitions on the use of such implements or devices such as an ankus or bullhook will eliminate abuse. Used appropriately, these tools do not pose a threat to nor are they a source of injury or harm to elephants. People are the source of abuse and when it occurs, there should already be adequate provisions in Connecticut's Penal Codes and the federal Animal Welfare Act to punish offenders. AZA suggests that you carefully consider the following excerpted section from the AZA Standards for Elephant Management and Care as you continue your deliberations.

1. Behavior management

1.1. Training

1.1.1. Electrical devices designed for use on livestock, such as commercially manufactured electric prods and shocking collars/belts, are prohibited as routine training tools or for handling animals during exhibition. Electric prods are permissible only as an emergency safety device; however, their use is restricted to situations in which keepers feel the imminent need to defend themselves against elephant attacks, or to protect an elephant from possible injury (see Schanberger et al. 2001).

1.1.2. Elephant training terminology and descriptions of specific behaviors are outlined in the *AZA Schools for Zoo and Aquarium Personnel Principles of Elephant Management (PEM) Course Notebook* (AZA Board of Regent's 2001). Trained behaviors should allow the elephant staff access to the animal in order to accomplish all necessary animal care and management procedures and permit inter-institutional consistency. The PEM-recommended list of commands and their corresponding behaviors are ones that every elephant and elephant keeper must know so that basic husbandry and veterinary practices can be accomplished. Behaviors should be reinforced so that all elephants attain close to 100% compliance upon request of the elephant staff (Sevenich et al. 1998).

Appropriate elephant training may employ several training aids or "tools". The goal of a good trainer is to be able to reduce the amount of time any particular training aid is used (Roocroft and Zoll 1994).

The AZA considers the following training tools/techniques to be inappropriate for use at member institutions:

- a. Insertion of any implement into any bodily orifice, unless directed by a veterinarian specifically in connection with training for a medical or reproductive procedure.
- b. Striking an elephant with anything more substantial than an ankus (a traditional training tool used by elephant trainers)
- c. Striking an elephant with any sharp object, including the hook of an ankus (Fowler 1995).
- d. Striking an elephant on or around any sensitive area, such as the eyes, mouth, ears, or genital region.
- e. No tools used in training should be applied repeatedly and with such force that they cause any physical harm to an animal (i.e., breaking of the skin, bleeding, bruising, etc.).
- f. Withholding or reducing an animal's daily-recommended amount of food and or water.
- g. Withholding veterinary care for any reason.

If properly executed training procedures are ineffective in eliminating aggressive or inappropriate behavior in a given animal, institutions should consider other alternatives, including transfer to a facility with more experienced staff or a different management system. Protracted and repeated use of corporal discipline in training is of serious ethical concern and AZA considers abusive training practices to be unacceptable. Further, elephants that are untrained, unexercised, or unable to complete minimum behavioral requirements may be considered neglected and thereby abused.

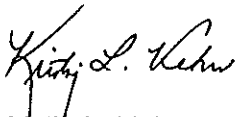
Conclusion

With more than 3,880 years of collective elephant management experience and an extensive network of scientific advisors covering the disciplines of nutrition, veterinary medicine, pathology, behavior, reproduction, population management, education, and research, the elephant care professionals at AZA-accredited zoos have led the way in the overall advancement of the health and welfare of elephants. We care deeply about the elephants in our zoos, and are continuously raising elephant care and management standards to create high-quality elephant programs. AZA's Elephant Standards for Management and Care underscore the substantial resource commitments involved in appropriately maintaining these magnificent animals. AZA-accredited zoos with elephants are meeting these commitments and are continuously improving their elephant programs.

AZA-accredited zoos meet the conservation test, playing an essential role in the survival of elephants in the wild. We support and generate millions in funding for elephant conservation projects in the wild including field-based training, habitat restoration, reduction of human-elephant conflict, ecotourism and community-based initiatives. Elephants are ambassadors, calling us to action to protect all wildlife. Our commitment to them and to wildlife conservation has never been stronger.

Thank you for the opportunity to comment.

Respectfully,



Kristin L. Vehrs
Executive Director

Encl.

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